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ORIGINAL

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SDMS DocID 2126319

May 17, 2004

Mr. Harry R. Steinmetz
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Weavexx Corporation

Dear Mr. Steinmetz,

This letter will confirm our request for a 30 day extension on our requirement to respond to your letter of May 4, 2004 for information regarding our subsidiary, Weavexx Corporation, formally Huyck Corporation (d/b/a Huyck Felt) pertaining to the Safety Light Corporation site.

Pursuant to subsequent telephone conversations and an e-mail, you have approved said 30 day extension, whereby we have until July 2, 2004 to respond.

Thank you for your cooperation in this matter.

With best regards,

John R. Cormier
V/P - Treasurer



P.O. Box 471
Wake Forest, North Carolina 27588-0471
Customer No. 800/932-8399
Tel: 919/556-7235
Fax: 919/556-2432

June 30, 2004

Harry R. Steinmetz (3HS11)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 09103-2029

Re: Information Request Regarding Safety Light Corporation Site, Bloomsburg,
Pennsylvania; Response of Weavexx

Dear Mr. Steinmetz:

This is the response of Weavexx to EPA's letter of May 4, 2004 concerning the above-referenced matter. We have diligently searched all records and have consulted with persons who might have information responsive to EPA's information requests, but have not uncovered anything related to the Safety Light Site.

We are not certain of the meaning of the single document provided by EPA. The document identifies Huyck Felt Co. and it appears to concern Strontium 90, although that is not entirely clear. Very small amounts of Strontium 90 were contained as a component in mass density testing devices used by both Huyck Felt Co. and Weavexx. These devices are known as beta and gamma gauges in the industry. The devices are sold and maintained by companies such as NDC or EGS Gauging, and utilize very small amounts of a radioactive isotope to measure mass. The older beta gauge devices used Krypton or Strontium 90. Newer gamma gauges, in use today, use Americium as the source element. The EPA document appears to reference two transactions in 1964 and 1965 concerning 6 mc's of St 90 (possibly Strontium 90). This would

be a very minute amount of the substance. It has always been the practice to return the testing devices to the vendor after use. Therefore, we are somewhat confused as to why there would be any dealings with the Safety Light company.

Thank you for the extension of time in which to respond to EPA's requests. If you have any questions, or have any additional information that might shed light on this situation, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Rick Ayre". The signature is written in a cursive style with a large, stylized "R" and "A".

Rick Ayre



P.O. Box 471
Wake Forest, North Carolina 27588-0471
Customer No. 800/932-8399
Tel: 919/556-7235
Fax: 919/556-2432

Information Request Regarding Safety Light
Corporation Site, Bloomsburg, Pennsylvania; Response of Weavexx

1. Describe in detail the business relationship between Huyck Felt Co. and Safety Light.

We have no records nor do we otherwise have any knowledge of any business relationship between Huyck Felt Co., and Safety Light. We have inquired of employees who might know of a relationship, and no one recalls Safety Light.

2. Did Huyck Felt Co. ever transport and/or broker hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by either U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite to the Site?

We have no records or knowledge of any such transport or brokering.

3. If you answered "yes" to Question 2, please answer the following questions:

- a. Provide the name, current address (or most recent address available); telephone number, and contact person for each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes.

N/A

- b. Provide the time period during which you transported/brokered each customer/generator/transporter's hazardous substances, radioactive waste or other wastes.

N/A

- c. For each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes, provide:

N/A

- i. the entity which received the hazardous substances, radioactive waste or other wastes (i.e., U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite);

N/A

- ii. the type of hazardous substances, radioactive waste or other wastes that were disposed/reclaimed;

N/A

- iii. the amount of hazardous substances, radioactive waste or other wastes transported/brokered to the Site by you;

N/A

- iv. the dates of the pickup/delivery of the hazardous substances, radioactive waste or other wastes;

N/A

- v. all personal and internal company documents and correspondence regarding the type and amount of hazardous substances, radioactive waste or other wastes, dates transported/brokered to the Site, and transactions with U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite;

N/A

- vi. the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other parties that have documentation or information pertaining to the transportation/disposal of hazardous substances, radioactive waste or other wastes at the Site.

N/A

4. Did Huyck Felt Co. ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite at the Site?

We have no information indicating that any waste was sent to the site by Huyck Felt Co.

5. If you answered "yes" to Question 4, please address the following issues:

- a. Please provide the following information regarding all wastes and by-products produced by your company during the period 1945 to the present:
- i. the nature of radioactive waste or other wastes, hazardous substances, and/or by-products used, including their chemical content, characteristics, and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers). Provide chemical analyses and Material Safety Data Sheets ("MSDSs"). If these analyses are not available for the period 1977-1991, submit analyses for the time period closest to these dates and describe, in

detail, any changes in the process(es) in which radioactive waste or other wastes were produced that would affect the chemical analyses;

N/A

- ii. the annual quantity of radioactive waste or other wastes, hazardous substances, and/or by-products used or generated;

N/A

- iii. the processes) in which radioactive waste or other wastes, hazardous substances, and/or by-products were used or the processes) that generated each;

N/A

- iv. the types of containers used to treat, store, or dispose of radioactive waste or other wastes, hazardous substances, and/or by-products; and

N/A

- v. the method of treatment and/or disposal of the above.

N/A

- b. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons, including you, who, during the period 1945 to the present, may have:

- i. disposed of or treated radioactive or hazardous materials at the Site;

N/A

- ii. arranged for the disposal or treatment of radioactive or hazardous materials at the Site; and

N/A

- iii. arranged for the transportation of radioactive or hazardous materials to the Site (either directly or through transshipment points) for disposal or treatment.

N/A

- c. If your response to the above includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain these arrangements and provide documentation confirming the nature of those transactions. Please identify:

- i. the persons with whom you, or other such persons, made such arrangements;

N/A

- ii. every date on which such arrangements took place;

N/A

- iii. for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;

N/A

- iv. the precise locations at which each material was disposed or treated at the Site;

N/A

- v. the persons who selected the Site as the place at which materials were disposed or treated;

N/A

- vi. the final disposition of each material involved in such transactions; and

N/A

- vii. the names of employees, officers, owners, and agents for each transporter.

N/A

- d. For each and every instance in which you/your company arranged for disposal or treatment of material at the Site, identify:

- i. the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and

N/A

- ii. any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat, store, transport, or dispose of materials at the Site.

N/A

- e. Provide the names, titles, and areas of responsibility of any persons, including all Huyck Felt Co. employees, present and former, who are knowledgeable of the waste disposal practices of your company during the period 1945 to the present. Include current addresses and dates of birth for former employees.

In addition to the employees listed in response 5.k, the former employees listed below may have knowledge of the waste disposal practices of the company. All the listed individuals were employed by Huyck/Weavexx and may have had knowledge of the Rensselaer facility, which according to the document provided by EPA, is the source of a shipment from Huyck. This facility has been closed for over 20 years, making it difficult to better determine former material handling practices.

Dave Phibbs, Radiation Safety Officer for Huyck Research Center in the late 70's and early 80's

Jim Sherrer, former President of Huyck (late 70's - mid 80's)

Tony Hooper, former President of Huyck (late 80's - 1994)

Jack Prevost, various positions within the Huyck Corporation (last-Weavexx Credit Manager

Bruce Cuilla, various positions within the Huyck Corporation (last-Weavexx Credit Manager

Dave Hilton, various positions within the Huyck Corporation (last-Weavexx Credit Manager

We do not have the addresses for all these individuals.

- f. Describe any permits or applications and any correspondence between Huyck Felt Co. and any regulatory agencies regarding materials transported to or disposed of at the Site.

We are not aware of any such permits, applications or correspondence.

- g. Provide copies of any correspondence between Huyck Felt Co. and any third party regarding materials transported or disposed of at the Site.

We are not aware of any such correspondence.

- h. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.

We have no information responsive to this request.

- i. Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.

We have no information responsive to this request.

- j. Provide the name, title, address, and telephone number of the person answering these questions on behalf of the respondent.

**Rick Ayre – VP Manufacturing
Weavexx Corporation
51 Flex Way
Youngsville, NC 27596
(919) 556-7235 x404**

- k. For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.

The employees listed below were consulted in preparation of our response, but none had information responsive to the requests. If you would like additional information concerning these individuals, please let us know.

Rick Ayre	VP Manufacturing
Dave Pretty	Senior VP Sales and Technology
John Pickering	Farmville Plant Manager
Billy Stanfill	Farmville Maintenance Manager
Ed Barber	Wet End Equipment Manager
Roy Jones	Forming Fabric Applications Engineer
Donna Meserve	Xerium Human Resources Manager
Tom Sundling	Northeast Sales Representative
Wayne Freeman	Forming Technology Manager
Tom Polaski	Wet End Equipment Technical Representative
Arthur Bullerwell	Tissue Application Specialist

6. If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.

We do not know of any individuals within the company, past or present, who may have more detailed responses.

7. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, then provide the names, titles, areas of responsibility, current addresses, and telephone numbers of the persons from whom such information or documents may be obtained.

We are not aware of responsive information or documents that may be in the possession of others.

8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

We have no such information.

9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:

We have no documents pre-dating 1997 because of corporate transactions and the simple passage of time.

- a. Your document retention policy.

Copy of current Records Retention Policy attached.

- b. A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction.

We have no information regarding how documents were destroyed prior to 1997. See answer to 9(a) for current policy.

- c. A description of the type of information that would have been contained in the documents.

It is not possible to know with certainty what type of information might have been contained in any such documents.

- d. The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction-of these documents.

It is not possible to answer this question since we are not certain what documents might have existed prior to 1997.

Xerium, S.A.

Financial and Management Procedures

Issued: May 2003

Reference: FMP E2

RETENTION OF DOCUMENTS

A. GENERAL

B. RECORD MANAGEMENT

C. MICROFILM

D. OTHER

APPENDICES

- 1. CHECKLIST FOR ESTABLISHING THE IMPORTANCE OF A DOCUMENT**
- 2. GENERAL PRINCIPLES FOR DETERMINING RETENTION PERIODS**

Xerium, S.A.**Financial and Management Procedures**

Issued: May 2003

Reference: FMP E2

RETENTION OF DOCUMENTS**A. GENERAL**

1. The objective of this policy is to give guidance on document retention to ensure key documents are not destroyed while avoiding excessive storage costs.
2. The need to retrieve records varies depending on the nature of the Operating Unit and type of industry. The key influencing factors are:
 - i.) The period during which there is regular reference to documents.
 - ii.) The potential needs of third party, for example auditors or tax inspectors.
3. Consultation with individuals before making a final decision will gain their support. It is recommended that these opinions be consolidated into a general consensus by a working party. This working party should include at least one member from Senior Management, a representative from the department whose records are being retained and the person designated for controlling record retention. Such a policy is likely to be effective and remain unchanged for many years. Each Unit should develop a program for selecting records for retention or destruction. An effective policy will ensure that:
 - i.) Procedures exist which identify and eliminate those records of short-term interest as soon as possible (see Appendix 1).
 - ii.) There is a central repository for each document type with clearly identified retention periods.
 - iii.) Once documents are no longer required for regular reference, they are transferred to a central store, thus releasing premium storage space. The general principles, which need to be considered when determining document retention periods, are noted in Appendix 2.
4. The General Manager is responsible for ensuring that the Unit complies with all statutory, fiscal, business, audit and other requirements concerning document retention.
5. All Company records must be examined at least annually to confirm compliance with record retention requirements.
6. Any records that would otherwise be scheduled for destruction under the suggested retention program that are related to any threatened, pending or active litigation or claim, must be retained until such matters are resolved.

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Issued: May 2003

Reference: FMP E2

RETENTION OF DOCUMENTS

B. RECORD MANAGEMENT

1. The storage methods used must ensure that:
 - i.) Records worth preserving permanently are identified at the earliest possible moment and are preserved under proper conditions.
 - ii.) All other records are efficiently stored, managed and retained only for as long as they are needed.

Note especially that certain fax images fade rapidly. Copies should be made and retained where required.
2. Efficient systems require that records are:
 - i.) Regularly reviewed to establish specific retention periods under a retention schedule.
 - ii.) Readily available for reference as long as they are required. The retrieval system, therefore, needs to use clear and effective identification indexing.
 - iii.) Destroyed on due date, and not allowed to occupy valuable storage space after their useful life is over.
3. Repositories may be used where:
 - i.) There is a shortage of storage space.
 - ii.) They are capable of returning records required for reference within 24 hours.
 - iii.) They will regularly destroy records at the end of their retention period, in consultation with the department of origin.

C. MICROFILM

1. Where the introduction of microfilming is being considered, a Financial Executive must assess the cost effectiveness of this and other alternatives.
2. Microfilming should be considered for all standard documents, such as invoices. Documents will need to be sorted into sequence and then divided into sections before filming. This makes record location easier.
3. The indexing system should be the same as the original documents.
4. A signed certificate by a Company official confirming that the microfilm is a true reproduction of all the originals contained on it must be filmed with the documents to enable the films authenticity to be proved in Court, if required.
5. No original documents must be destroyed until the films have been reviewed through a vigorous quality control procedure.
6. Microfilm information must be capable of being readily converted into a legible format.

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RETENTION OF DOCUMENTS

7. Computer output can be printed directly on to microfilm without the use of an intermediate paper print. This warrants management consideration since there are potential savings in stationery, ease of access, elimination of storage facilities and on-line computer time. A fiche system is normally preferred to roll film for the following reasons:

- Fiche referencing systems enable quick identification of documents.
- Each fiche only contains a certain number of transactions. This enables data to be sorted and allocated onto a specific fiche, thus reducing the time taken to find documents even if references are unknown as only a limited number need be scanned once the correct fiche has been located.
- Fiche may be stored on ring binders that have been suitably adapted, thus enabling rapid access.

Any questions should be directed at the Corporate Office.

8. Legal and Related Requirements:

8.1 Legal

Certain original documents must not be destroyed, namely:

- i.) Documents bearing evidence of alteration.
- ii.) Transactions dealing with land, hire purchase and guarantees.

8.2 Auditors

Xerium's outside auditors must be advised before introducing a microfilm system. Consultation is necessary to avoid concerns on acceptability of microfilm as audit evidence.

D. OTHER

1. Disposal of Material waste and Scrap

Units have a legal duty of care to take all reasonable steps to look after any waste they have and prevent its illegal disposal by others. Penalty for non-compliance is an undefined amount.

When waste changes hands, a transfer slip must be completed and signed by both parties and a written description of the waste handed over. This must be retained by both parties and a written description of the waste handed over. Both parties must retain this for two years, as they may have to prove in court where the waste came from and what they did with it.

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RETENTION OF DOCUMENTS

2. Use in Defense Litigation

Regardless of statutory limitation periods, documents that are relevant to litigation must be retained. These may include those relevant to work done, unfair dismissal or common law claims.

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RETENTION OF DOCUMENTS**Appendix 1****CHECKLIST FOR ESTABLISHING THE
IMPORTANCE OF A DOCUMENT**

The decision as to when a document will cease to have a value to a Unit is a matter of judgment. When making this decision, the following should be considered:

- A. What loss, financial or otherwise, is likely to be incurred by the Unit if the document is destroyed?
- B. What is the likelihood of the information in the document or a copy document, being obtained from other sources?
- C. How frequently is the document likely to be referred to?
- D. If the document is thought to have a use, is it because it constitutes:
 - 1) A precedent to be followed?
 - 2) A record of past policy or practice?
 - 3) Evidence of authority for a transaction?
 - 4) Legal evidence of a transaction?
 - 5) A record of original thinking?
- E. What would the intended user of the document do instead if it could not be found when required?
- F. Is future reference to the document likely to be:
 - 1) Essential?
 - 2) Desirable?
 - 3) Probably of no value?
 - 4) Definitely a waste of time?

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RETENTION OF DOCUMENTS**Appendix 2****GENERAL PRINCIPLES FOR DETERMINING
RETENTION PERIODS****A. Duplication of Records**

- 1) Many copies are used merely to keep people informed of periodic results or current action.
- 2) Once seen, it is not necessary to preserve these copies, provided there is access to centrally held masters.
- 3) Files can build up on the same subject in more than one registry. Provided there is one master file, which is best kept in the department who has most use for it, the other subsidiary records can be destroyed.

B. Legal and related requirements

- 1) Organizations must keep information and documents available to discharge certain legal obligations.
- 2) Regulations may vary by country. It is recommended that Units prepare a summary that address local regulations.

C. Records of policy decision

- 1) Policy files normally rank for permanent retention.
- 2) Those to be kept contain papers showing the evolution of executive policy decisions.

D. Results of executive action

- 1) Some retained files will contain papers detailing executive action to meet exceptional circumstances which are not covered by established document retention policy. Such files should clearly indicate their special interest and be separated from normal transactions.

E. Correspondence and memoranda

- 1) Should only be retained beyond one year if they grant or confirm to your Unit a clear legal right or release from potential liability, or if they supplement, amend or explain a contractual right or obligation. In those cases, one copy of such communication should be retained in the file with the principle document to which it relates.